

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

RICARDO MEDINA MEDINA

Plaintiff,

v.

HCL AMERICA, INC.

Defendant.

CASE NO. 3:17-CV-01017-CCC

**WRONGFUL TERMINATION; BREACH
OF CONTRACT; WAGES;
DEFAMATION**

**MOTION FOR LEAVE TO FILE REPLY IN SUPPORT OF DEFENDANT’S MOTION
FOR PARTIAL JUDGMENT ON THE PLEADINGS AND CHANGE OF VENUE
AND EXTENSION OF TIME**

TO THE HONORABLE COURT:

COMES NOW Defendant HCL America, Inc. (“HCL America” or “Defendant”), by and through its counsel of record, and respectfully states and prays as follows:

1. On June 23, 2017, HCL America filed its Motion for Judgment on the Pleadings and Change of Venue (the “Motion”). (Dkt. #12).
2. On July 6, 2017, Plaintiff Ricardo Medina Medina (“Medina” or “Plaintiff”) filed an Objection to the Motion. (Dkt. #13). In his Objection, Medina raises issues of law outside the scope of the Motion, namely, the doctrine of collateral estoppel. (*See generally* Dkt. #13).
3. For the Court to fully and adequately adjudicate these new issues, it is necessary for HCL America to address them in a Reply brief. Furthermore, principles of justice and fairness dictate that HCL America should be afforded the opportunity to respond Medina’s representations of the record in asserting his estoppel argument. Also, given that this is the first occasion on which

these issues have been raised in this litigation, HCL America needs additional time to prepare its Reply and appropriately address them with the Court.

4. Therefore, HCL America respectfully requests that this Honorable Court grant leave, under Local Civil Rule 7(c), to file a Reply to Plaintiff's Objection.

5. Furthermore, the period to file the Reply expires today, July 13, 2017. Therefore, HCL America respectfully requests a 5-day extension of time to file its Reply, which will expire on July 18, 2017.

WHEREFORE, HCL America respectfully requests that this Honorable Court grant leave to file a Reply Memorandum, a 5-day extension of time to file such Memorandum and provide any further relief as it deems just and proper.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, on the 13th day of July 2017.

CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of July 2017, a copy of the preceding Motion for Leave to File Reply to Plaintiff's Opposition to Defendant HCL America, Inc.'s Motion for Partial Judgement on the Pleadings and Extension of Time was filed electronically. Notice of this filing will be sent by email to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM /ECF System.

Respectfully submitted,
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